PUBLIC COMMENT HEARING ON GREYHOUND CESSATION FUND PROPOSED RULES MINUTES JULY 29, 2015

The Iowa Racing and Gaming Commission (IRGC) met on Wednesday, July 29, 2015 at The Meadows Events Center, Prairie Meadows Racetrack & Casino, Altoona, IA. Commission members present were Jeff Lamberti, Chair; Carl Heinrich, Vice Chair, and members Richard Arnold and Kristine Kramer. Commissioner Dolores Mertz was absent.

Chair Lamberti called the meeting to order at 8:30 AM and requested a motion to approve the agenda. Commissioner Heinrich moved to approve the agenda. Commissioner Kramer seconded the motion, which carried unanimously.

Chair Lamberti stated the purpose of the meeting is to receive public comment on the proposed rules with respect to the greyhound cessation fund. He noted legislation was passed last year in which the Commission was directed to determine some elements of how the fund is to be distributed consistent with the legislation. The Commission did retain the services of a consultant to assist them and make some recommendations. Based on those recommendations and the legislation, the Commission has distributed proposed rules. Chair Lamberti noted the Commission has received some comments, and the purpose of this meeting to take further public comment on the proposed rules. He advised individuals should go to the podium when their name is called if they wish to speak. He called on Brian Ohorilko, Administrator of IRGC, for some general comments.

Mr. Ohorilko stated any previously received comments have been disseminated to the Commission members. He addressed the following points and questions from those comments. With regard to 7.15(3), the Commission received some comments about giving consideration to doing away with the application process for the breeders and owners distributions, specifically where the applicant would supply documentation to the Commission, and instead of doing that, utilizing information received directly from Bluffs Run, Mystique and the Department of Agriculture. He stated the Commission would be interested in hearing further comments on possibly modifying this rule.

Within the same rule, Mr. Ohorilko addressed the issue of points being awarded for individual greyhounds registered. He stated the intent of that particular rule is to award points for greyhounds that are whelped and raised for the first six months when they are recorded and registered with the Department of Agriculture. He noted there may be other times that a dog could be registered with the Department of Agriculture, but it is at that point in time the Commission is looking for in order to award the points. He indicated the rule would be clarified prior to final adoption of the rules.

Chair Lamberti asked Mr. Ohorilko to provide those in attendance with the process following this meeting. Mr. Ohorilko stated the Commission members and staff will take into consideration the comments received. If there are any modifications made, those will come back before the Commission at a subsequent meeting, most likely in August; however, if there are material changes, it could be later than that. He stated the rules will need to come back before the Commission for final adoption. He advised that would be the last step, but noted they could go back before the Administrative Rules Review Committee.

Chair Lamberti moved to the public comment section of the meeting. He advised the Commission would not be terribly strict on the time, assuming individuals do not abuse the privilege.

Mr. Ohorilko called on Dean Miner, who indicated he was present representing his partner, John Filipelli and their company, Filipelli and Miner Racing, LLC. Mr. Miner noted that in preparing their comments, they had discussions with American Greyhound Track Operators Association members, commission members from other states, and approximately ten lawyers from several states to make sure their comments were accurate. Mr. Miner noted today's meeting was for discussion of the Spectrum Gaming rules, but requested latitude to discuss other issues tying into those rules and the amount of money involved.

Mr. Miner commenced his comments by addressing the individuals and process leading up to the drafting and passage of the legislation dealing with the cessation of greyhound racing at Bluffs Run Greyhound Park in Council Bluffs and Mystique Casino in Dubuque; and the granting of a license to the Iowa Greyhound Association to conduct racing at the Iowa Greyhound Park in Dubuque. He also commented on the Iowa Greyhound Association and its executive board; and the Commission's decision regarding the escrow fund established in Council Bluffs.

Chair Lamberti advised the Commission is aware there is a lot of emotion regarding past actions on how the legislation came to be and the Commission's decision regarding the escrow fund, but that is not the purpose of this meeting. He stated the Commission is not going to listen to comments rehashing previous decisions. Chair Lamberti pointed out the Commission did not pass the legislation; they are implementing it. He noted the Commission's decision regarding the escrow fund is final. The Commission is here to receive comments regarding the proposed rules regarding the cessation fund. He stated that while the Commission is aware of the emotion regarding those issues, this is not the proper forum.

Mr. Miner stated that his comments tie in to his comments regarding the rules. Chair Lamberti stated he needed to get to his comments on the rules.

Jeana Wilhite asked if there was \$36 million going to Dubuque that was not tied to the legislation; that it was up to the Commission to decide whether or not they receive the funds.

Chair Lamberti stated her comment was not entirely correct; the legislation states that one-half of the money goes for the operation of the track in Dubuque provided they continue to operate it. If

the track ceases operations, any money left over goes back into the cessation fund. He stated what the Commission is dealing with at this meeting, and what the rules are addressing, is the legislation, which directed the Commission to determine how to disburse the \$36 million in the cessation fund. He reiterated that the Commission was not involved in the legislation.

Mr. Miner asked how speakers were to address how to disburse the \$36 million without discussing how that point was arrived at.

Chair Lamberti stated that as far as the Commission is concerned, those issues are not relevant to the decision making process. He noted that it is relevant to his position with respect to the Iowa Greyhound Association, but the legislation has been passed, signed into law by the Governor, and the Commission has been directed to implement a process for disbursing the funds.

Mr. Miner stated it appears the Commission is using, as did Spectrum Gaming, the suggestion of 1099s from 2010-2014. Chair Lamberti stated that is on point to the rules, and it is clear he does not agree with the proposed rule. He stated the Commission is willing to hear any suggestions he may have regarding the disbursement of the funds.

Mr. Miner stated he was at a loss as to how to make a point that the Commission is considering something that was clearly drafted by individuals who may have had a vested interest in steering the Commission to disburse the fund in a manner so that a specific individual and his inner circle would like to have the funds disbursed. He stated that he would like to illustrate how the industry reached this point. Mr. Miner stated his belief that the individuals who will receive the bulk of the money had the legislation drafted on their behalf and believes he can illustrate that and feels that should be taken into consideration by the Commission with regard to the drafted rules. He stated that if the individuals were able to put a suggestion into the legislation, and it appears the Commission has great latitude in drafting the rules; then he feels some credence must be given to who benefits the most and who crafted the words. Mr. Miner stated he wanted the leeway to show a pattern of misrepresentation that shows the individuals who made the suggestion are the people who are looking to take more than the lion's share of the \$100 million and have a personal interest in it. He stated he is troubled by the fact the Commission only wants to hear his comments regarding the \$36 million. He noted there are only nine speakers and feels he can wrap up his comments in another fifteen minutes. Mr. Miner stated he understood the Commission's position. He stated the issue is not about \$36 million, but a handful of people enriching themselves egregiously and continuously misrepresenting facts to the Commission. He believes those issues should be taken into account. Mr. Miner stated that he wanted to touch on a couple of issues that did not fit into the framework and hoped the Commission would allow him to cover those topics.

Mr. Miner then referenced comments made at the November Commission meeting by representatives of the Iowa Greyhound Association regarding kennel bookings and how those would be handled. He also touched on the financing for the operation of the Iowa Greyhound Park by the Iowa Greyhound Association.

Commissioner Heinrich asked Mr. Miner if he was saying the amount shown on the 1099 would have an impact on their distribution.

Mr. Miner stated the legislation contains a suggestion that 1099s from 2010-2014 be used, and the Commission feels that is a guideline, and Spectrum included it in their report. He stated the manner in which the legislation was crafted enriches specific individuals in the Iowa Greyhound Association.

Commissioner Heinrich asked if Mr. Miner was saying the amount of money these individuals received, which affects their 1099s, will affect their distributions from the cessation fund. Mr. Miner indicated that was correct. Commissioner Heinrich asked for Mr. Miner's suggestion to correct this issue.

Mr. Miner stated he had submitted his own proposal, and several of his suggestions were considered in the Spectrum report.

Commissioner Heinrich stated he concurred with Chair Lamberti; the Commission did not have anything to do with the drafting of the legislation. He stated he wanted to know how that impacts the rules, and requested that he get to that portion of his comments.

Mr. Miner stated that when he and his partner put their proposal together, they attended two of the three Spectrum conferences. He stated the Iowa Greyhound Association offered no suggestions or proposals, and had indicated they would not due to a conflict of interest. He indicated the Spectrum report contained information received from two board members, which he called a conflict of interest on the part of Spectrum. Mr. Miner stated their proposal was posted on several websites, and was provided to the Commission and various media outlets and was very transparent; he did not think the Iowa Greyhound Association was very transparent in their actions. Mr. Miner stated he sent an e-mail to Spectrum inquiring about any other greyhound farms they might have visited in seeking information for their report.

Bob Hardison stated his purpose in attending the meeting was to object to any lies that were told. He stated Spectrum representatives never came to his farm; they met with many people at the racetracks and around the state in an effort to collect information for their report.

Chair Lamberti thanked him for his comments. He stated the Commission was not going to listen to any more accusations against people; that this was not the correct forum. He stated if individuals have suggestions regarding the rules; that is what this meeting is for. If comments are not related to the purpose of the meeting, the individual will not be allowed to continue with their comments. Chair Lamberti stated this is not a forum to make accusations against other people; there are other avenues available to them to pursue if that is their desire.

Mr. Miner requested the Commission consider a \$1 million cap on any person, family or entity receiving money from the fund, thus providing an opportunity to increase everyone's share. He requested that the Iowa Greyhound Association step forward and support the cap. He stated he

would find it interesting if an individual was not able to close down their greyhound business/operation and find a new career path with \$1 million. Mr. Miner stated individuals should not be allowed to double-dip in the cessation fund; if someone is continuing their career in the industry and continuing to receive benefits from the \$36 million set aside for racing, then those individuals should not be allowed to collect funds from the \$36 million retirement fund.

Mr. Ohorilko called on Jeff Wilhite. Mr. Wilhite stated it was not Governor Branstad's intention to make 8-10 kennel owners wealthy; but to get money to individuals interested in growing the horse and dog breeding programs. He stated some were interested in giving 80% of the money to the top 8-10 kennels in Iowa; they have forgotten there is a greyhound industry, not just 8-10 people. Mr. Wilhite stated the top kennels have already received 80% of the purse money in the last five years, and now have received another \$36 million to run for at Dubuque. He indicated those individuals and Spectrum believe they deserve 80% of the last \$36 million. Mr. Wilhite stated he feels the money should be split between the breeders, kennel owners and employees, and the adoption programs in the following manner: 96% - breeders and kennel owners; 3% to employees and 1% to the adoption programs. Everyone gets paid the same amount. He noted that many of the top kennels were not around when the points were paying very little in 1989-1991. Mr. Wilhite reiterated his opinion that the money should be split evenly. He called the current proposal for splitting the money wrong.

Mr. Wilhite moved to the topic of a soft landing, noting that many in the industry will not have a soft landing. He expressed his belief that only the top kennels will have a soft landing. He expressed his hope that the Commission will see the current proposal is wrong. He indicated most in the industry thought they would be splitting \$72 million instead of \$36 million, but that amount should be enough for everyone. He requested that the Commission look at things fairly and not be swayed by the Spectrum report. He stated the industry does not need Spectrum to tell them how to spend the remaining \$36 million.

Mr. Ohorilko called on Jeana Wilhite. Ms. Wilhite stated her husband was the first person at Bluffs Run Greyhound Park, and had a kennel there until 2012. She noted that a few people could get rich, while they no longer have the ability to work. They had intended to breed and raise dogs to make a living but that possibility is now gone. She stated that it will not take \$5,000 to move a kennel out of the track; it will take two tanks of gas as the crates belong to the racetrack. All the kennel owner needs to remove is any medications, grooming supplies, etc. She does not believe that it is necessary to provide funds for removing a kennel from the track. She requested the Commission consider her husband's proposal as it would give everyone plenty of money.

Mr. Ohorilko called on George Darnell. Mr. Darnell, owner of Sunshine Veterinary Clinic, addressed draft rule 7.15(2)f — one time payments for industry participants. He stated the arbitrary cap of \$29,250 does not appear to have any direct relevance to the actual hardship involved. He indicated he has been a practicing veterinarian at Bluffs Run since it opened in 1986; and has been licensed by the Commission for the last 29 years. Mr. Darnell stated that since the track opened he has invested in a rural veterinary clinic, specialized orthopedic

equipment, and attended numerous greyhound seminars in order to more effectively treat the racing greyhound at Bluffs Run. He stated 95% of his current practice is working on the greyhounds at Bluffs Run, and he will be forced to retire when the track closes. Mr. Darnell stated his income from Bluffs Run has averaged \$74,250 for the last six years, but was considerably higher when times were better. Mr. Darnell stated he does not feel the one-time payment of \$29,250 is equitable considering his investment and 29-year commitment to the Bluffs Run greyhounds.

Mr. Ohorilko called on Rick Bartley. Mr. Bartley asked if there is any possibility of scrapping the Spectrum report and starting over. Chair Lamberti stated the rules being discussed are proposed rules; he indicated there is a possibility of no modifications to them to significant modifications. He stated the meeting today is to provide an opportunity for the Commission to receive comments from interested parties. The Commission will take the comments under consideration before coming up with the final rules.

Mr. Bartley stated he was happy to see the Spectrum report included compensation for the trainers and assistant trainers, noting he had made the suggestion at the Spectrum meeting in Council Bluffs. He advised that he has promised his help one month's severance pay if they stayed until the end - \$8,000 for trainers and \$4,000 for assistant trainers. Mr. Bartley stated that if the Commission tweaked how the funds are disbursed they should not change that one.

Mr. Bartley stated the rules do not address the issue of the contract farms. He stated he came to Iowa in 2000, and there were 3-4 Iowa residents that had racing kennels, which he characterized as another aspect of the greyhound industry. He indicated it is an area that takes time to grow into and understand; and that many Iowa breeders needed out-of-state contracts to come into the racetrack and operate the kennel. Mr. Bartley stated his kennel was 50/50 or a little heavier on the Iowa-bred side. He stated he has a big farm in Abilene, Kansas with approximately 300 head, down from 7,000. He noted he has spent a significant amount of money in Iowa over the last 15 years for help, veterinarian care, food, etc. Mr. Bartley stated the owner raises the dog until it is old enough to be on the track – 16 months at Bluffs Run, at which time the contract operator takes over paying the bills. He stated he used to figure \$3,500 per dog per week, but thinks it is closer to \$4,500. Mr. Bartley stated he owns the majority of his dogs, but does lease some. He stated there should be a lump sum payment for the contract farm operators.

With regard to the figure of \$1,700 for adoption fees per greyhound, Mr. Bartley indicated the amount is too high. He stated he spoke to a couple of different individuals who work with reputable adoption agencies, and could provide the Commission with contact information. He also advised the National Greyhound Association has a list of accredited adoption agencies.

Commissioner Heinrich asked what he recommended. Mr. Bartley stated the dogs could be moved. He asked if the adoption money was only for greyhounds that have been raced in Iowa. Mr. Ohorilko answered in the affirmative. He expressed his belief that he does not feel there will be that many dogs that will be placed for adoption.

Commissioner Heinrich asked Mr. Bartley if he felt \$200 was adequate to handle any adoption fees. Mr. Bartley stated he thought some could be done for \$50, depending on the agency, but no more than \$200.

Mr. Bartley questioned the cut-off date of October 2016 for submitting requests for reimbursement; he thought January 1st would be enough time. He stated the Dubuque dogs would have already been moved out-of-state by December 18th and the compound shut down. Transporting the dogs to another track is just part of the process, and he expects to pay those expenses as part of his operation. He stated the Commission should consider giving the contract farm operators some kind of payment as they are the ones putting the money out. He feels he spends more on a leased Iowa greyhound than the owners did raising it.

Mr. Bartley stated he did not understand about the hardship payment Mr. Darnell was talking about or what it might be for. He indicated the \$29,250 would not even pay for food for one month on his farm; the weekly feed bill is \$7,000.

Mr. Bartley stated his biggest concerns with the Spectrum report is the dates, why nothing until late in 2016, and then April 2017. He stated his interpretation of the rules is that there is no payment until sometime in 2016, and asked if that was correct. Chair Lamberti indicated that was correct as the rules are currently drafted.

Mr. Bartley stated that a significant portion of his income will cease on December 19th, but his expenses will not. He requested the Commission find a way to speed up the process. He noted the Commission is going to charge expenses against the fund for administering the fund. He indicated time is of the essence.

Chair Lamberti indicated the dollar amounts shown for the adoption of greyhounds or removing equipment from the facility are the maximums; the Commission will be requiring documentation before writing checks to cover those expenditures.

Mr. Bartley again requested the Commission review the time frames set forth in the proposed rules. He reiterated his offer to provide names and phone numbers of individuals that deal with greyhound adoptions, although he does not believe there will be many greyhounds put up for adoption with the closing of Bluffs Run. Mr. Bartley stated the funds set aside for the trainers and assistant trainers is important, and requested that it not be removed from the proposed rules.

Mr. Ohorilko called on John Filipelli. Mr. Filipelli commenced his comments by noting there were two funds – one for second-chance racing and the other for a soft landing. The first was to allow people to go on and keep racing dogs; the other for people who have had enough and wanted to start new lives. Mr. Filipelli stated those individuals who have elected to continue racing should not be able to also receive funds from the soft-landing fund. He hopes the Commission will take that into consideration when making their final decisions. He is cognizant of the fact these individuals have invested a significant amount of money in the state raising and

racing dogs; however, like any other business, they were paid. He questioned why they should be paid again. The soft landing fund is for future losses, not past earnings.

Mr. Filipelli brought up the escrow fund, and how it was being paid out at Bluffs Run versus Dubuque. After a short discussion, Chair Lamberti reiterated his earlier statement that the escrow fund is not the topic of this meeting; the Commission's decision with respect to the escrow money has been made and is final. The Commission explained some of their reasons behind their decision at that time.

Mr. Ohorilko called on Gail Shook. Ms. Shook asked for clarification on 7.15(2)g – Live greyhound racing in Dubuque County, noting Chair Lamberti had indicated those funds would go into the cessation fund and be combined with the remaining \$36 million. Chair Lamberti clarified that would occur only if racing ceased at Dubuque prior to 2022. Ms. Shook then asked if the Commission's decision on how those funds would be paid out would be based on what is decided today. Chair Lamberti answered in the affirmative.

Ms. Shook indicated she did not have an issue with the trainers and assistant trainers receiving compensation, but requested that there be a process to insure those individuals have paid taxes, and that there are no liens or unpaid taxes due.

Chair Lamberti advised all payments would be disbursed through the State, and if there are any outstanding monies owed to the State or other items the State has jurisdiction over, those funds will be withheld. He feels it will be handled similar to how refunds from the Department of Revenue are handled with respect to judgments, liens, past due taxes, etc.

Ms. Shook asked if the Commission would be issuing 1099s on the payments. Mr. Ohorilko stated he believed the State would do so. Chair Lamberti advised the Commission is determining how the funds will be disbursed but will not be making the actual disbursements.

Ms. Shook noted payments are going to be based on 1099s. She stated the 1099s that the kennel owners and owners received included commissions paid on non-Iowa dogs. She expressed her opinion that the fund should only be paid out to Iowa-bred dogs and not out-of-state dogs. She also stated she believes the kennels should not be entitled to as much as the owner/breeder as they spend 16 months getting the dog ready to go to the track. She conceded the kennel owner does have expenses, and may not be compensated for two to three months, but after that, the booking is 50/50. In her opinion, the kennel owners have already been paid. She noted there are only 14 kennel owners at Bluffs Run; she has applied but has not been able to get in. She also stated she does not believe any out-of-state individuals should receive any payment from the fund. She stated racing was set up for Iowa residents, and believes that fact is often forgotten. Ms. Shook stated her belief this is an Iowa thing and the money should stay in Iowa.

Ms. Shook asked Mr. Ohorilko if he had received her e-mail. She advised her e-mail addresses several other issues.

Mr. Ohorilko called on Ron Mullen. Mr. Mullen advised he started as a contract kennel owner in 1975 for \$5,000; and switched to a farmer thirteen years ago, which cost him considerably more to start. He stated the 20/80% division is way off; a contract kennel owner can start a business with \$5,000, but a farmer can't. Mr. Mullen stated 70 greyhounds have already been adopted from Bluffs Run this year, but does not believe there will be a significant number put up for adoption when the track closes. With regard to the trainers and assistant trainers, he advised some kennels have two or three assistant trainers, and feels the Commission should address how many assistant trainers will get paid. He stated he would like to see the Commission tweak the numbers and keep a little more money in Iowa.

Mr. Ohorilko called on Mark Spahos. Mr. Spahos thanked everyone who took the time to attend the meeting. He indicated he respects everyone's perspective on this issue, but is here to be the voice for those that aren't in attendance because they are working in the kennels or don't have the means to attend the meeting. It is his intent to add clarity so that decisions made going forward benefit the majority, not the minority. He noted those individuals who have moved on and are racing at Dubuque are gaining revenue and continuing to breed dogs. For those that did not get a kennel at Dubuque, they have little recourse and are relying on the Commission to provide the soft landing. Mr. Spahos stated the points he wanted to make today were a \$1 million cap per individual, and no double dipping. He feels the \$1 million cap should be agreeable to everyone. He noted that some of the kennel operators that went to Dubuque also have other kennel bookings across the country. It was their decision to move on, and they should not be allowed to receive funds from the soft landing money. Mr. Spahos stated he believes the intent of the legislation, or the Commission, should be to do the most good for the most amount of people.

Mr. Ohorilko called on Jason Hess. Mr. Hess asked about the annual payments for the greyhounds raised, he asked if that was at the six month inspection when they are registered Iowa-breds or once they get to the racetrack and are papered.

Mr. Ohorilko stated the intent was at the six-month period when the dog is registered; that would be the point the Commission is looking for to award the 32 points. He stated the rule would be clarified.

Mr. Hess asked if there had been any consideration given to trainers at Dubuque getting compensation. He noted there are four fewer kennels this year so some trainers lost their jobs and some of the trainers from Bluffs Run could possibly go to Dubuque and take jobs away from individuals already working there. Chair Lamberti stated that issue had not been part of the discussion, and thanked Mr. Hess for raising the issue. He noted there is an opportunity for the Commission to give it some thought.

Mr. Ohorilko called on Bob Rider. Mr. Rider stated one of his biggest concerns was when a greyhound was considered an Iowa-bred. He stated the paperwork required for the Department of Agriculture states the individual has to be a 2-year resident, have the dogs in your possession for the first six months of their life, the greyhound has to be inspected prior to the female having

the pups and right after the pups are delivered, and again when they are tattooed at six months. Mr. Rider stated he had brought some of the necessary paperwork for the Department of Agriculture to show the Commission if they are interested.

Mr. Rider stated the kennels at Bluffs Run and Dubuque are good kennels. He advised that he did not have any dogs racing in Iowa at this time because he was concerned about a conflict of interest if he was involved in deciding which kennels got booked at Dubuque. He wonders what will happen next year if the kennel bookings in Dubuque are wide open. He also expressed his opinion that the amount of money set forth for the adoptions was too high, but agrees with the fact that receipts will be required before payment is made. Mr. Rider also felt that was a good process for the kennel owners, noting the kennels owners in Dubuque move in and out every year because it is a six-month meet, and that they don't spend \$5,000 doing so. He stated one of his concerns is the fact that the Dubuque kennels aren't going to receive anything.

Mr. Rider asked how to go about getting the miscellaneous 1099s on the dogs; he asked if the racetracks would be providing the copies. He noted his original copies have been provided to whoever prepared his taxes. Mr. Ohorilko advised Mr. Rider the Commission has considered, and was looking for further comment, on doing away with the application process for past performance distributions and using information supplied by Bluffs Run, Mystique and the Iowa Department of Agriculture. Mr. Rider indicated the Department of Agriculture should pretty much have all of the information on the Iowa-bred dogs, but then recalled they would only have the information for the first year.

Mr. Bartley requested additional time. He noted that Bluffs Run was one of the safer tracks in the United States; however, due to some staff changes and inexperienced staff dragging the track, he expects injuries will start to occur. Mr. Bartley stated the Commission needs to insure the track surface is safe to prevent injury to the dogs. He stated Harrah's has no incentive to take care of the track or the dogs between now and December 18th.

Mr. Ohorilko advised track safety and the welfare of the dogs are paramount. He advised he would have Commission staff at the facility meet with management to address the issue. He stated there are procedures the Commission can put in place to insure the safety of the dogs.

Chair Lamberti noted the greyhound cessation fund law provides that if Caesar's fails to make the necessary payments into the fund, they will be required to conduct racing.

Chair Lamberti requested a motion to adjourn the meeting. Commissioner Heinrich so moved. Commissioner Arnold seconded the motion, which carried unanimously.

Chair Lamberti thanked everyone for their input, stating that it has been very helpful. He assured everyone that all of decisions have not been made, and all input will be taken into consideration.

MINUTES TAKEN BY	?:
JULIE D. HERRICK	